

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No: 1:17-cr-10339-WGY
)	
STEPHANIE DIPIERRO,)	
Defendant.)	

**ASSENTED-TO MOTION TO POSTPONE
DEFENDANT'S DATE OF SELF SURRENDER**

The United States of America, by and through the undersigned Special Assistant United States Attorney, respectfully moves this Court to postpone the date on which the defendant, Stephanie DiPierro, must surrender for the service of her sentence from April 8, 2019, to June 8, 2019. In support of this request, the government states as follows:

1. On November 27, 2018, the defendant pleaded guilty to Counts One through Six of the Indictment charging her with Theft of Public Money, in violation of 18 U.S.C. § 641; Making a False Statement, in violation of 18 U.S.C. § 1001(a)(2); and, Misuse of a Social Security Number, in violation of 42 U.S.C. § 408(a)(7)(B).

2. On February 25, 2018, this Honorable Court sentenced the defendant to one year and one day of imprisonment. (ECF Doc. 37). The defendant was ordered to surrender for service of the sentence at the institution designated by the Bureau of Prisons before 2:00 p.m. on April 8, 2019.

3. On March 15, 2019, the defendant filed a Complaint and Request for Injunctive Relief against the Acting Director of the Federal Bureau of Prisons and the Assistant Director of the Health Services Division of the Federal Bureau of Prisons in the District of Massachusetts, seeking declaratory and injunctive relief requiring the Federal Bureau of Prisons to provide her

with access to methadone throughout her term of incarceration at a Bureau of Prisons facility. (DiPierro v. Hurwitz and Schult, No. 1:19-cv-10495).

4. In an attempt to resolve the civil component to this case, the defensive unit of the United States Attorney's Office is attempting to negotiate a resolution of this civil case. Specifically, the Bureau of Prisons is attempting to identify a facility that can accommodate the defendant's addiction to opioids. Currently, the Bureau of Prisons has only one federal facility that could potentially accommodate the defendant, but it is located in Texas. As a result, additional time is requested to be able to fashion a resolution. A reporting date of June 8, 2019, will provide the United States Attorney's Office, along with the Bureau of Prisons, with adequate time to attempt to resolve this issue.

5. Counsel for the defendant assents to this motion.

Respectfully submitted,

ANDREW E. LELLING
United States Attorney

By: /s/ Karen B. Burzycki
Karen B. Burzycki
Special Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Karen B. Burzycki
Special Assistant U.S. Attorney

Dated: March 20, 2019